

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
LAMP RECYCLERS OF LOUISIANA, INCORPORATED
dba LAMP ENVIRONMENTAL INDUSTRIES (LEI)
DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL

The LDEQ, Office of Environmental Services, is accepting written comments on a draft hazardous waste operating permit renewal for Lamp Recyclers of Louisiana, Inc., P.O. Box 2962, Hammond, Louisiana 70404-2962 for the Hammond Facility container storage areas. **The facility is located at 46257 Morris Road, Hammond, Tangipahoa Parish.**

Lamp Recyclers of Louisiana, Inc. (LEI) submitted a permit renewal application for the Hammond Facility to store hazardous wastes and universal waste as a destination facility in the recycling of universal waste.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, June 21, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit renewal application dated March 17, 2008, Responses to Notice of Deficiency (NOD) dated February 22, 2010 and additional information submitted March 12, 2010 are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy may be reviewed at the Tangipahoa Parish Library - Hammond Branch, 314 East Thomas Street, Hammond, Louisiana.

Previous public notices were published in The Hammond Daily Star on April 16, 2008 and on April 25, 2008.

Inquiries or requests for additional information regarding this permit action should be directed to Karla Vidrine, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3466.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft hazardous waste permit and associated information can be viewed on the LDEQ permits public webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 24512, Permit Number LA0 000 365 668-OP-RN-1, and Activity Number PER20080001.

Scheduled Publication Date: May 4, 2010

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04/30/07

FACT SHEET

FACT SHEET

FOR THE DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL PREPARED FOR

**Lamp Recyclers of Louisiana, Incorporated (Inc.) dba Lamp Environmental Industries (LEI)
Hammond Facility**

**EPA ID Number LA0 000 365 668
Agency Interest # 24512**

**46257 Morris Road
Hammond, Louisiana
Tangipahoa Parish**

**Permit Number LA0 000 365 668-OP-RN-1
PER20080001**

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste operating permit renewal for Lamp Recyclers of Louisiana, Incorporated (Inc.) dba Lamp Environmental Industries (LEI), EPA ID Number LA0 000 365 668, Agency Interest Number 24512, that is physically located at 46257 Morris Road, Hammond, Tangipahoa Parish, Louisiana with a mailing address of Post Office Box 2962, Hammond, Tangipahoa Parish, Louisiana 70404-2962.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste operating permit renewal that addresses the requirements of LAC Title 33, Part V.Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA), at the Hammond facility.

Lamp Recyclers of Louisiana, Inc. is seeking an operating permit renewal to store commercial hazardous and non-hazardous waste (universal waste) in containers.

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permit decision process. The LDEQ's Waste Permits Division is required to prepare this draft permit. The draft permit sets forth all the applicable conditions, which the Permittee is required to comply with during the life of the permit.

Lamp Recyclers of Louisiana, Inc. submitted its hazardous waste operating permit renewal application, dated March 17, 2008. Deficiencies were issued on December 9, 2009. Response to the Notice of Deficiency (NOD) was submitted on February 22, 2010, and additional information was submitted March 13, 2010 to comply with the regulations for facilities that are permitted to store hazardous waste under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

A technical review of the working draft of the proposed permit was issued on March 31, 2010 and responses received on April 7, 2010. This information has been included and made part of this draft permit.

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the Permittee to comply with the requirements of the LAC 33:V.Subpart 1.

The public is given a minimum of forty-five (45) days to review and comment on the draft permit. The Administrative Authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the Administrative Authority shall be to issue, deny, modify, or revoke the draft permit in accordance with LAC 33:V.705.

A. NEW DRAFT HAZARDOUS WASTE PERMIT

The Administrative Authority has reviewed the permit application and other pertinent technical information. A draft hazardous waste operating permit has been prepared setting forth certain specific conditions pertaining to the operations and maintenance of the listed units.

This draft permit is a tentative determination and is not the final decision of the Administrative Authority.

B. PUBLIC COMMENT PERIOD

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Lamp Recyclers of Louisiana, Inc. – Hammond facility, must do so within the allotted forty-five (45) day comment period.

Public notice of the proposed permitting action shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

If LDEQ finds a significant degree of public interest, a public hearing will be held. The date, location and time would be provided in the public notice for the hearing. LDEQ will hold the hearing at least forty-five (45) days after the date on which the public notice is given.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft hazardous waste operating permit renewal, fact sheet, and supporting documents are available for review at the Tangipahoa Parish Library – Hammond Branch, 314 East Thomas Street, Hammond, Louisiana.

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on the draft permit to the administrative authority, at the address listed below, by the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and Agency Interest (AI) number), and
4. supporting relevant facts upon which the comments are based.

All comments, requests for public hearings, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals, who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Karla Vidrine
Louisiana Department of Environmental Quality
Office of Environmental Services
Waste Permits Division
Post Office Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3070 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

Lamp Recyclers of Louisiana, Inc. (LEI) owns and operates an existing commercial hazardous waste storage facility located in Hammond, Louisiana that has been in operation since 1994. The facility is physically located at 46257 Morris Road in Hammond, Louisiana, at latitude 30° 31' 28" and longitude 90° 26' 07". The facility mailing address is Post Office Box 2962, Hammond, Louisiana 70401-2962.

The facility is located on a tract of land situated in the Southeast Quarter of Section 18, Township 6 South, Range 8 East, in the Parish of Tangipahoa, State of Louisiana.

The following hazardous waste codes are managed and/or generated at the facility: Liquid and Solid Storage-Universal Waste, Polychlorinated Biphenyls Waste, and/or Hazardous Waste consisting of the following hazardous waste codes:

- D001 - Ignitable
- D002 - Corrosive
- D003 - Reactive
- D004 - Arsenic
- D005 - Barium
- D006 - Cadmium
- D007 - Chromium
- D008 - Lead
- D009 - Mercury
- D010 - Selenium
- D011 - Silver
- U151 - Mercury
- PCB wastes

IV. HAZARDOUS WASTE FACILITIES

The facility consists of ten (10) container storage areas under one roof. One (1) area is equipped with permanent secondary containment, eight (8) areas are equipped with portable secondary containment, and one (1) area has no secondary containment. Liquid wastes are only stored in the areas with secondary containment. In addition, the facility has operational and inspection procedures in place to ensure the container storage areas are operated and maintained in accordance with all applicable state and federal regulations. These engineered and procedural safeguards minimize the potential for releases to the environment.

V. FINANCIAL AND LIABILITY REQUIREMENTS

The Permittee shall have and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Condition III.O.7, Table 1 of the Permit.

VI. IT QUESTION SUMMARY OF ANALYSIS

In accordance with the requirements set forth by the Louisiana Supreme Court in Save Ourselves v. Louisiana Environmental Control Commission, 452 So2d 1152 (La. 1984), the LDEQ has considered certain factors in the draft decision of this operating permit. This is a preliminary analysis based on the information currently available to the LDEQ.

A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

This permit does not propose the alteration of waste classifications, codes or characteristics. The design and operating procedures associated with the container storage areas will comply with all regulatory and permit requirements to prevent the releases to the environment. These actions minimize the potential and real adverse environmental effects of handling hazardous waste to the maximum extent possible.

B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.

LEI is an existing facility, the proposed draft hazardous waste operating permit renewal should have little or no affect on property values or public costs as they pertain to the economics of the local community. Both state and local economies benefit from the provisions of employment and tax revenue by the facility's operations.

C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

The proposed draft hazardous waste operating permit renewal is for the existing and proposed hazardous waste container storage areas. The permitted container storage areas utilize secondary containment structures that minimize the potential for releases of hazardous constituents to soil or groundwater.

All reasonable measures to protect the environment are being taken. No mitigating measures would offer more protection to the environment without unduly curtailing non-environmental benefits.

**TECHNICAL
REVIEW OF
WORKING DRAFT
OF PROPOSED
PERMIT**

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	Lamp Recyclers, Inc. dba Lamp Environmental Industries (LEI)	AI #: 24512	TEMPO Activity No: PER20080001
Facility Name:	Lamp Recyclers, Inc dba Lamp Environmental Industries (LEI)	Remarks Submitted by:	
Permit Writer:	Karla Vidrine	Permit Writer Email address:	Karla.Vidrine@la.gov

Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. "Permit Condition II.E.21.a"). **Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – *DO NOT COMPLETE THIS SECTION*. This section will be completed by Waste Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- *DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.*

Permit Reference	Remarks	Waste Permits Division Response (for official use only)
II.E.25.a	LEI has submitted documentation that the facility's waste analysis plan has been certified by a Louisiana licensed professional engineer in accordance with LAC 33:V.1519.D.	The LDEQ acknowledges your comment and agrees. The waste analysis certification was received and meets the requirements of LAC 33:V.1519.D. Condition II.E.25.a has been removed from the permit.
II.E.25.b	Due to the requirements for depicting significant surrounding distances, it is not possible to produce a map at the scale of 1"=200' to depict a 2-mile radius as shown on the table. The maximum size for printing/reproduction and scanning is 2' x 3'; the scale used (1"=1,000') is the only scale that can be used for this map size.	The LDEQ acknowledges your comment but has determined the current map scale to be insufficient. The maps and aerial photograph submitted were at a scale that did not clearly identify the facility layout, units, surrounding areas, etc. The maps and aerial photograph submitted do not meet the requirements of LAC 33:V.515.A.15-17 and 517.B.

The following table illustrates the actual drawing size needed to display the required 2 mile radius coverage area at various drawing scales.

Scale	Coverage Area	Actual Drawing Size (inches)	Actual Drawing Size (feet)
1"=200'	2 mile radius	105.6 x 105.6	8.8 x 8.8
1"=400'	2 mile radius	52.8 x 52.8	4.4 x 4.4
1"=600'	2 mile radius	35.2 x 35.2	2.9 x 2.9
1"=800'	2 mile radius	26.4 x 26.4	2.2 x 2.2
1"=1000'	2 mile radius	21.1 x 21.1	1.8 x 1.8

As seen in the table, a scale of 1"=1000' is the smallest scale that will show the 2 mile radius coverage area on a standard "D" size drawing (36" x 24" or 3' x 2').

It is LEI's understanding that the Department's principal concern is that the maps be large enough to legibly read the required information, and LEI believes it has accomplished that goal using the maps scales previously provided.

LEI believes that the utilization of an alternate scale for some of the maps still provides adequate detail to facilitate the review process. As a result, in accordance with LAC 33:V.517.B.13 and LAC 33:V.519, LEI has previously requested the utilization of an alternate scale for the referenced maps.

The Schedule of Compliance item (II.E.25.b) will remain in the permit as:

II.E.25.a. Within thirty (30) days of the effective date of this permit, the Permittee must submit updated maps to the required scale. The current maps provided at the alternate map scale (1"=1000') are not legible. The facility layout, units, surrounding areas and actual location could not be identified on the maps at the scale provided. A request for an alternate map scale should have been submitted prior to the submission of the application. The regulations state that all maps must be clear, legible and identifiable. A map or aerial photograph can be on two sheets with an identifiable section line.

PUBLIC PARTICIPATION

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
LAMP RECYCLERS OF LOUISIANA, INCORPORATED
dba LAMP ENVIRONMENTAL INDUSTRIES (LEI)
DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL

The LDEQ, Office of Environmental Services, is accepting written comments on a draft hazardous waste operating permit renewal for Lamp Recyclers of Louisiana, Inc., P.O. Box 2962, Hammond, Louisiana 70404-2962 for the Hammond Facility container storage areas. **The facility is located at 46257 Morris Road, Hammond, Tangipahoa Parish.**

Lamp Recyclers of Louisiana, Inc. (LEI) submitted a permit renewal application for the Hammond Facility to store hazardous wastes and universal waste as a destination facility in the recycling of universal waste.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, June 21, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

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Previous public notices were published in The Hammond Daily Star on April 16, 2008 and on April 25, 2008.

Inquiries or requests for additional information regarding this permit action should be directed to Karla Vidrine, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3466.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft hazardous waste permit and associated information can be viewed on the LDEQ permits public webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm

All correspondence should specify AI Number 24512, Permit Number LA0 000 365 668-OP-RN-1, and Activity Number PER20080001.

Scheduled Publication Date: May 4, 2010

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04/30/07

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

4/29/2010

Telephone: (225) 383-1111

Fax: (225) 388-0164

Email: legal.ads@theadvocate.com

Ms. Susan Bush
Legal Advertising
Advocate
P.O. Box 588
Baton Rouge, LA 70821-0588

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in the Advocate once only on Tuesday, May 04, 2010. You will also receive a copy of the legal notice itself via email. Immediately after publication, please fax a copy of the ad to Ms. Laura Ambeau at (225) 325-8157.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please call me at (225) 219-3277 or email: laura.ambeau@la.gov
Charges for this service should be billed to:

Mr. Landyn Oller
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
Post Office Box 2962
Hammond, LA 70404
Telephone: (800) 309-9908

The official proof of publication in the form of a tear sheet and invoice should be mailed to the attention of Ms. Laura Ambeau, LDEQ, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. We appreciate your assistance in our efforts to serve the public.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published on the _____ (date of publication) edition of The Advocate:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
A124512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

The Advocate:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

4/29/2010

Telephone: (985) 254-7805

Fax: (985) 524-9134

Email: legalads@hammondstar.com

Ms. Tammy Pierson
Legal Advertising
Daily Star
P.O. Box 1149
Hammond, LA 70404-1149

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
A124512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Dear Ms. Pierson:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in the Daily Star once only on Tuesday, May 04, 2010. You will also receive a copy of the legal notice itself via email. Immediately after publication, please fax a copy of the ad to Ms. Laura Ambeau at (225) 325-8157.

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please call me at (225) 219-3277 or email: laura.ambeau@la.gov
Charges for this service should be billed to:

Mr. Landyn Oller
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
Post Office Box 2962
Hammond, LA 70404
Telephone: (800) 309-9908

The official proof of publication in the form of a tear sheet and invoice should be mailed to the attention of Ms. Laura Ambeau, LDEQ, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. We appreciate your assistance in our efforts to serve the public.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA
Attachments

VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published on the _____ (date of publication) edition of The Daily Star:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
A124512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

The Daily Star:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

April 29, 2010

Telephone: (985) 345-0060
Via Fax: (985) 542-9377
Ms. Tamika Lee
WFPR AM Broadcasting-Hammond
200 East Thomas Street
Hammond, LA 70401

RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana

Dear Ms. Lee:

Please broadcast the enclosed public announcement regarding the above referenced facility at the best possible time at the least cost once only on **Tuesday, May 4, 2010.**

Charges for this service should be billed to:

Mr. Landyn Oller
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
Post Office Box 2962
Hammond, LA 70404
Telephone: (800) 309-9908

For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Radio' form and fax it my attention at (225) 325-8157 as soon as the announcement has been made.

If there is any problem with broadcasting this announcement in its entirety, or if you have any questions, please call me immediately at (225) 219-3277.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist
Public Participation Group

/la
Attachment

VERIFICATION BY RADIO STATION

The undersigned verifies that the announcement was broadcast on _____ as requested for:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

WFPR-AM, Hammond, LA

Signed: _____ Date: _____

Please complete and mail or fax this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, La. 70821-4313
FAX: (225) 325-8157

LDEQ RADIO ANNOUNCEMENT

DRAFT HAZARDOUS WASTE OPERATING PERMIT

The Louisiana Department of Environmental Quality is accepting written comments on a draft hazardous waste operating permit for Lamp Recyclers of Louisiana, Incorporated dba Lamp Environmental Industries (LEI), located at 46257 Morris Road, Hammond, Tangipahoa Parish.

The public comment period will end on Monday, June 21, 2010 at 12:30 p.m.

A copy of the draft hazardous waste operating permit and related documents are available for review at the Tangipahoa Parish Library – Hammond Branch, 314 East Thomas Street, Hammond, LA and the Louisiana Department of Environmental Quality Public Records Center in Baton Rouge, LA.

The detailed public notice is scheduled for publication in the Hammond Daily Star and The Advocate on May 4, 2010.

For any inquiries contact LDEQ Customer Service Center at (225) 219-LDEQ, that is (225) 219-5337.

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Mr. Landyn Oller, Environmental Manager **APR 30 2010**
Lamp Recyclers, Inc.
P.O. Box 2962
Hammond, Louisiana 70404-2962

RE: Lamp Recyclers of Louisiana, Inc. dba Lamp Environmental Industries (LEI)
AI#24512/EPA ID No. LA0 000 365 668/Permit No. LA0 000 365 668-OP-RN-1/PER20080001
Draft Hazardous Waste Operating Permit Renewal for Container Storage Areas

Dear Mr. Oller:

Enclosed is a copy of the Lamp Recyclers of Louisiana, Inc. Draft Hazardous Waste Operating Permit Renewal for the Container Storage Areas, LA0 000 365 668-OP-RN-1 that incorporates language pertaining to storage operations at the Hammond facility.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft hazardous waste operating permit renewal. If there is a significant degree of public interest, a public hearing will be held. The date, location and time would be provided in the public notice for the hearing at least forty-five (45) days after the date on which the public notice is given. Specific dates for the beginning and ending of the comment period are contained in the public notice.

Prior to taking a final action on the operating permit, the Administrative Authority will consider all significant comments submitted. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision will be in accordance with LAC 33:V.705.

Please reference your Agency Interest Number 24512, EPA ID Number LA0 000 365 668, Permit Number LA0 000 365 668-OP-RN-1, and Permit Activity Number PER20080001 on all future correspondence pertaining to this issue. If you have any questions, please contact Ms. Karla Vidrine of the Waste Permits Division at (225) 219-3466.

Sincerely,

A handwritten signature in cursive script, appearing to read "S. Phillips".

Sam Phillips
Administrator
Waste Permits Division

kav

Enclosure

VERIFICATION BY FACILITY

The undersigned verifies that **Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas** has received a copy of the draft hazardous waste operating permit and public notice regarding:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

**Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries
(LEI)-Container Storage Areas**

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277

FAX (225) 325-8157



BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

4/29/2010

Telephone: 985-345-3909
Fax: 985-345-2188

Mr. Bill Dorman
Branch Manager
Tangipahoa Parish Library - Hammond
314 E Thomas St
Hammond, LA 70401

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Dear Mr. Dorman:

We request that the enclosed documents for the permitting action for referenced company/facility be made available for public review upon receipt in the Tangipahoa Parish Library - Hammond. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Haz Waste Permits Division will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Attachments/

VERIFICATION BY LIBRARY

The undersigned verifies that Tangipahoa Parish Library - Hammond , 314 E Thomas St, Hammond, LA has received a copy of the Draft Hazardous Waste Operating Permit Renewal associated with the following public notice:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
A124512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Tangipahoa Parish Library - Hammond

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permit Support Services Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**



BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

4/29/2010

Telephone: (985) 542-3400
Fax: (985) 542-3619

Honorable Mayson Foster
Mayor of Hammond
PO Box 2788
Hammond, LA 70404-2788

RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana

Dear Mayor Foster:

The Louisiana Department of Environmental Quality (LDEQ) is requesting public comments regarding permitting actions for the Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas, 46257 Morris Rd, Hammond, LA.

For your reference, attached is a copy of the Draft Hazardous Waste Permit Renewal and legal notice that is scheduled to be published in/or announced on:

<i>WFPR-AM</i>	<i>Tuesday, May 04, 2010</i>
<i>Daily Star</i>	<i>Tuesday, May 04, 2010</i>
<i>Advocate</i>	<i>Tuesday, May 04, 2010</i>

It is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on the Draft Hazardous Waste Permit Renewal may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Permits Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 24512

Should you have any questions, additional permit information may be obtained from Karla Vidrine, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3466. Should you have any questions regarding the public notice, please contact Laura Ambeau, LDEQ, Permit Support Services Division, Permit Support Section, at (225) 219-3277.

Please complete the attached 'Verification of Receipt' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA / Attachments/

VERIFICATION BY PARISH GOVERNMENT

The undersigned verifies that the city of Hammond has received a copy of the Draft Hazardous Waste Permit Renewal associated with the following public notice:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

City of Hammond:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Support Services Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

April 29, 2010

Phone: (225) 219-3600
fax: (225) 219-3695

Mr. Bobby Mayweather
Capital Regional Office
602 North 5th Street
Baton Rouge, La. 70821-4312

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc-Lamp Environmental Industries (LEI) Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Dear Mr. Mayweather:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste operating permit and public notice/request for public comment for the referenced facility that is scheduled to be published in The Advocate and The Hammond Daily Star on May 4, 2010.

The copy of these documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Should you have any questions regarding the facility, additional permit information may be obtained from Ms. Karla Vidrine, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3466.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA/Enclosures

VERIFICATION BY REGIONAL OFFICE

The undersigned verifies that the Capital Regional Office has received a copy of the draft hazardous waste operating permit and public notice regarding:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Capital Regional Office:

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Ms. Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Environmental Assistance Division
PO Box 4313
Baton Rouge, LA 70821-4313
Phone (225) 219-3277**

FAX (225) 325-8157



BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

4/29/2010

Telephone: (214) 665-6750
Fax: (214) 665-6762

Mr. Kishor Fruitwala
EPA Region VI
1445 Ross Avenue
Dallas, TX 752022733

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
AI24512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

Dear Mr. Fruitwala:

For your reference, The Louisiana Department of Environmental Quality (LDEQ) is enclosing a copy of the Draft Hazardous Waste Operating Permit regarding permitting actions for the Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas.

For your reference, attached is a copy of the Draft Hazardous Waste Permit and the legal notice is scheduled to be published in/or announced on:

WFPR-AM Radio
Daily Star
Advocate

Tuesday, May 04, 2010
Tuesday, May 04, 2010
Tuesday, May 04, 2010

It is also posted on the LDEQ Website, found at www.deq.state.la.us. Written comments on this permit action may be submitted to Ms. Soumaya Ghosn, LDEQ-OES, Permit Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 24512.

Should you have any questions, additional permit information may be obtained from Karla Vidrine, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3466. Should you have any questions regarding the public notice, please contact me at, (225) 219-3277.

Please complete the attached 'Verification of Receipt' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

Laura Ambeau

Laura Ambeau
Environmental Scientist, Public Participation Group

LA

Post Office Box 4313 • Baton Rouge, Louisiana 70821-4313 • Phone 225-219-3181 • Fax 225-219-3309
www.deq.louisiana.gov

VERIFICATION BY EPA

The undersigned verifies that Region VI, 1445 Ross Avenue, Dallas, TX has received a copy of the Draft Hazardous Waste Operating Permit associated with the following public notice:

**RE: Request For Public Comments On a Draft Hazardous Waste Permit Renewal
Lamp Recyclers of Louisiana, Inc.-Lamp Environmental Industries (LEI)-Container Storage Areas
A124512, PER20080001, Permit Number LA0000365668-OP-RN-1
Hammond, Tangipahoa Parish, Louisiana**

EPA Region VI

By: _____ Date: _____

Please complete and return this form promptly to the address listed below:

**Laura Ambeau
Louisiana Department of Environmental Quality
Office of Environmental Services
Permit Support Services Division
PO Box 4313
Baton Rouge, LA 70821-4313
PHONE (225) 219-3277
FAX (225) 325-8157**

SIGNATURE PAGE

DRAFT
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT RENEWAL
FOR HAZARDOUS WASTE STORAGE
LAMP RECYCLERS OF LOUISIANA, INCORPORATED (INC) dba LAMP
ENVIRONMENTAL INDUSTRIES (LEI) – HAMMOND FACILITY

PERMITTEE: LAMP RECYCLERS OF LOUISIANA, INC.

**EPA IDENTIFICATION
NUMBER:** LA0 000 365 668

PERMIT NUMBER: LA0 000 365 668-OP-RN-1
Agency Interest # 24512
PER20080001

**FACILITY
LOCATION:** 46257 MORRIS ROAD
HAMMOND, LOUISIANA 70401

**FACILITY MAILING
ADDRESS:** POST OFFICE BOX 2962
HAMMOND, LOUISIANA 70404-2962

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 30:2171 et seq., and the regulations adopted thereunder, and the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA), to Lamp Recyclers of Louisiana, Inc. dba Lamp Environmental Industries (LEI), (hereafter called the Permittee), to operate a hazardous waste storage facility physically located at 46257 Morris Road, Hammond, Louisiana, Tangipahoa Parish, at latitude 30° 31' 28" and longitude 90° 26' 07".

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of HSWA of 1984, which modify Sections 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification or revocation and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This renewed permit shall be effective as of _____, and shall remain in effect until _____, unless revoked and reissued, modified or terminated in accordance with the LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within thirty (30) days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality
Office of the Secretary
Attention: Hearing Clerk, Legal Services Division
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

DRAFT

Cheryl Sonnier Nolan, Assistant Secretary
Louisiana Department of Environmental Quality

Date

PART A

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal (See Instructions on page 14.) MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # <u>4</u>) <input type="checkbox"/> As a component of the Hazardous Waste Report		
2. Site EPA ID Number (page 15)	EPA ID Number <u>L</u> <u>A</u> <u>0</u> <u>0</u> <u>0</u> <u>0</u> <u>3</u> <u>6</u> <u>5</u> <u>6</u> <u>6</u> <u>8</u>		
3. Site Name (page 15)	Name: Lamp Recyclers of Louisiana, Inc. dba Lamp Environmental Industries		
4. Site Location Information (page 15)	Street Address: 46257 Morris Rd		
	City, Town, or Village: Hammond		State: Louisiana
	County Name: Tangipahoa		Zip Code: 70401
5. Site Land Type (page 15)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Classification System (NAICS) Code(s) for the Site (page 15)	A. <u>5</u> <u>6</u> <u>2</u> <u>2</u> <u>1</u> <u>1</u>		B. <u>5</u> <u>6</u> <u>2</u> <u>2</u> <u>1</u> <u>9</u>
	C. <u>5</u> <u>6</u> <u>2</u> <u>9</u> <u>2</u> <u> </u>		D. <u> </u> <u> </u> <u> </u> <u> </u> <u> </u> <u> </u>
7. Site Mailing Address (page 16)	Street or P. O. Box: P.O. Box 2962		
	City, Town, or Village: Hammond		
	State: Louisiana		
	Country: United States		Zip Code: 70404
8. Site Contact Person (page 16)	First Name: Agee "Landyn"		MI: Last Name: Oller
	Phone Number: (985) 345-4356 Extension:		Email address: lolle@lei-inc.net
9. Operator and Legal Owner of the Site (pages 16 and 17)	A. Name of Site's Operator: Lamp Recyclers of Louisiana, Inc.		Date Became Operator (mm/dd/yyyy): 03/27/1994
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: Lamp Recyclers of Louisiana, Inc.		Date Became Owner (mm/dd/yyyy): 03/27/1994
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

EPA ID NO: LA 0000365668

OMB#: 2050-0034 Expires 11/30/2005

9. Legal Owner (Continued) Address	Street or P. O. Box: P.O. Box 2962	
	City, Town, or Village: Hammond	
	State: Louisiana	
	Country: United States	Zip Code: 70404

10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 18 to 21.)

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)
of non-acute hazardous waste; or☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous WasteY ☐ N ☐ 3. Treater, Storer, or Disposer of
Hazardous Waste (at your site) Note:
A hazardous waste permit is required for
this activity.Y ☐ N ☐ 4. Recycler of Hazardous Waste (at your
site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial
Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner
Exemption☐ b. Smelting, Melting, and Refining
Furnace ExemptionY ☐ N ☒ 6. Underground Injection Control

B. Universal Waste Activities

Y ☐ N ☐ 1. Large Quantity Handler of Universal Waste (accumulate
5,000 kg or more) [refer to your State regulations to
determine what is regulated]. Indicate types of universal
waste generated and/or accumulated at your site. If "Yes",
mark all boxes that apply:

	Generate	Accumulate
a. Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other (specify) Antifreeze	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Other (specify) Electronics	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Other (specify) Mercury Containing Equipment	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Y ☐ N ☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter

If "Yes", mark each that applies.

☐ a. Transporter
☐ b. Transfer FacilityY ☐ N ☒ 2. Used Oil Processor and/or Re-refiner

If "Yes", mark each that applies.

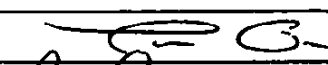
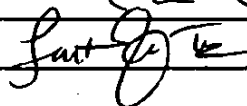
☐ a. Processor
☐ b. Re-refinerY ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of
Off-Specification Used Oil to
Off-Specification Used Oil Burner☐ b. Marketer Who First Claims the
Used Oil Meets the Specifications

EPA ID NO: L A 0 0 0 0 3 6 5 6 6 8

OMB#: 2050-0034 Expires 11/30/2005

11. Description of Hazardous Wastes (See instructions on page 22.)						
A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.						
D001	D002	D003	D004	D005	D006	D007
D008	D009	D010	D011	U151		
B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.						
12. Comments (See instructions on page 22.)						
13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 22.)						
Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)				
	Landyn Oller, Compliance Manager	02-16-10				
	Larry Fannaly, Vice President of Sales and Operations	2-16-10				

EPA ID NO: | L | A | 0 | 0 | 0 | 0 | 3 | 6 | 5 | 6 | 6 | 8 |

OMB #: 2050-0034 Expires 11/30/2005

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See instructions on page 23)	First Name: Agee "Landyn"		MI:	Last Name: Oller													
	Phone Number: (985) 345-4356			Phone Number Extension:													
2. Facility Permit Contact Mailing Address (See instructions on page 23)	Street or P.O. Box: P.O. Box 2962																
	City, Town, or Village: Hammond																
	State: Louisiana																
	Country: United States			Zip Code: 70404													
3. Operator Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: P.O. Box 2962																
	City, Town, or Village: Hammond																
	State: Louisiana																
	Country: United States		Zip Code: 70404		Phone Number: (985) 345-4356												
4. Legal Owner Mailing Address and Telephone Number (See instructions on page 23)	Street or P.O. Box: P.O. Box 2962																
	City, Town, or Village: Hammond																
	State: Louisiana																
	Country: United States		Zip Code: 70404		Phone Number: (985) 345-4356												
5. Facility Existence Date (See instructions on page 24)	Facility Existence Date (mm/dd/yyyy): 06/24/1994																
6. Other Environmental Permits (See instructions on page 24)																	
A. Permit Type (Enter code)	B. Permit Number										C. Description						
RCRA	L	A	0	0	0	0	3	6	5	6	6	8	RCRA Hazardous Waste Storage Permit				
NPDES	L	A	G	5	3	0	0	0	0				NPDES Class I Sanitary General Permit				
7. Nature of Business (Provide a brief description; see instructions on page 24)																	
Lamp Recyclers of Louisiana, Inc. dba Lamp Environmental Industries is a commercial hazardous and universal waste management and universal waste lamp destination facility.																	

EPA ID NO: L A 0 0 0 0 3 6 5 6 6 8

OMB #: 2050-0034 Expires 11/30/2005

Process Codes and Design Capacities (See instructions on page 24) - Enter information in the Sections on Form Page 3.

A. PROCESS CODE - Enter the code from the list of process codes in the table below that best describes each process to be used at the facility. Fifteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), enter the process information in Item 9 (including a description).

B. PROCESS DESIGN CAPACITY - For each code entered in Section A, enter the capacity of the process.

- 1. AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
- 2. UNIT OF MEASURE** - For each amount entered in Section B(1), enter the code in Section B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

C. PROCESS TOTAL NUMBER OF UNITS - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	<u>Disposal:</u> Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	<u>Treatment (continued):</u> Cement Kiln	For T81-T93:
D80	Landfill	Acres; Hectares; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure in Code Table Below	T86	Blast Furnace	
S01	<u>Storage:</u> Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T87	Smelting, Melting, or Refining Furnace	Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S03	Waste Pile	Cubic Yards or Cubic Meters	T89	Methane Reforming Furnace	
S05	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T90	Pulping Liquor Recovery Furnace	
S06	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Hectares; or Cubic Yards	T91	Combustion Device Used in The Recovery Of Sulfur Values From Spent Sulfuric Acid	
S99	Containment Building Storage	Cubic Yards or Cubic Meters	T92	Halogen Acid Furnaces	
S99	Other Storage	Any Unit of Measure in Code Table Below	T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T01	<u>Treatment:</u> Tank Treatment	Gallons Per Day; Liters Per Day	T94	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour
T02	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day	X01	<u>Miscellaneous (Subpart X):</u> Open Burning/Open Detonation	Any Unit of Measure in Code Table Below
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Btu Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million Btu Per Hour	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; Gallons Per Day; Liters Per Hour; or Million Btu Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Btu Per Hour; or Million Btu Per Hour
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Btu Per Hour; or Million Btu Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acres; Hectares; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons.....	G	Short Tons Per Hour.....	D	Cubic Yards.....	Y
Gallons Per Hour.....	E	Metric Tons Per Hour.....	W	Cubic Meters.....	C
Gallons Per Day.....	U	Short Tons Per Day.....	N	Acres.....	B
Liters.....	L	Metric Tons Per Day.....	S	Acres-foot.....	A
Liters Per Hour.....	H	Pounds Per Hour.....	J	Hectares.....	Q
Liters Per Day.....	V	Kilograms Per Hour.....	R	Hectare-meter.....	F
		Million Btu Per Hour.....	X	Btu Per Hour.....	I

EPA ID NO: | L | A | 0 | 0 | 0 | 0 | 3 | 6 | 5 | 6 | 6 | 8 |

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Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only					
					(1) Amount (Specify)	(2) Unit of Measure (Enter code)							
X 1	S	0	2		5 3 3 . 7 8 8	G	0 0 1						
1	S	0	1		18370 . 0	G	001						
2													
3													
4													
5													
6													
7													
8													
9													
1 0													
1 1													
1 2													
1 3													
1 4													
1 5													

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter in sequence with Item 8)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process					
					(1) Amount (Specify)	(2) Unit of Measure (Enter code)							
X 2	T	0	4		1 0 0 . 0 0 0	U	0 0 1	In-situ Vitrification					

EPA ID NO: | L | A | 0 | 0 | 0 | 0 | 3 | 6 | 5 | 6 | 6 | 8 |

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10. Description of Hazardous Wastes (See Instructions on page 25) - Enter information in the Sections on Form Page 5.

A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in Section A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Section A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in Section B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the listed hazardous wastes.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in Section A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item 10.D(1).
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 10.E.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in Section A. On the same line complete Sections B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In Section A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Section D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES											
				(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION- (If a code is not entered in D(1))	
X 1	K 0 5 4	900	P	T	0	3	0	8	0						
X 2	D 0 0 2	400	P	T	0	3	0	8	0						
X 3	D 0 0 1	100	P	T	0	3	0	8	0						
X 4	D 0 0 2													Included With Above	

EPA ID NO: L A 0 0 0 0 3 6 5 6 6 8

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10. Description of Hazardous Wastes (Continued. Use the Additional Sheet(s) as necessary; number pages as 5 a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)			B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES										
	(1) PROCESS CODES (Enter code)										(2) PROCESS DESCRIPTION (If a code is not entered in D(1))					
1	D	0	0	1	250000	POUNDS	S	0	1							Container Storage
2	D	0	0	2	250000	POUNDS	S	0	1							Container Storage
3	D	0	0	3	250000	POUNDS	S	0	1							Container Storage
4	D	0	0	4	250000	POUNDS	S	0	1							Container Storage
5	D	0	0	5	250000	POUNDS	S	0	1							Container Storage
6	D	0	0	6	250000	POUNDS	S	0	1							Container Storage
7	D	0	0	7	250000	POUNDS	S	0	1							Container Storage
8	D	0	0	8	250000	POUNDS	S	0	1							Container Storage
9	D	0	0	9	250000	POUNDS	S	0	1							Container Storage
10	D	0	1	0	250000	POUNDS	S	0	1							Container Storage
11	D	0	1	1	250000	POUNDS	S	0	1							Container Storage
12	U	1	5	1	250000	POUNDS	S	0	1							Container Storage
13																
14																
15																
16																
17																
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11. Map (See instructions on pages 25 and 26)

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See instructions on page 26)

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See instructions on page 26)

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See instructions on page 26)

LEI is a major service vendor for the recycling of lighting waste containing (D009) Mercury, (D008) Lead and (D006) Cadmium. At present LEI maintains a Louisiana Department of Environmental Quality Hazardous Waste Permit. This permit LA0 000 365 668, pursuant to the Louisiana Environmental Quality Act (R.S. 30:2001), authorizes LEI to store and recycle mercury, lead or cadmium containing fluorescent and H.I.D. lamps and for storage of 250,000 pounds total of applicable universal, hazardous, and PCB waste, with liquid waste limited to 13,720 gallons in secondary containment storage units, consisting of the following hazardous waste codes :

Ignitable (D001)	Cadmium (D006)
Corrosive (D002)	Chromium (D007)
Reactive (D003)	Lead (D008)
Arsenic (D004)	Mercury (D009)
Barium (D005)	Selenium (D010)
Silver (D011)	Mercury (U151)
Polychlorinated Biphenyls (PCB)	

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LIST OF ATTACHMENTS

ATTACHMENT 1.....	LIST OF FACILITY DOCUMENTS INCORPORATED IN PERMIT BY REFERENCE
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BODY OF PERMIT

DRAFT
HAZARDOUS WASTE OPERATING PERMIT RENEWAL
LAMP RECYCLERS OF LOUISIANA, INCORPORATED (INC)
dba LAMP ENVIRONMENTAL INDUSTRIES

EPA ID# LA0 000 365 688
HAMMOND, LOUISIANA
TANGIPAHOA PARISH

Agency Interest #24512
PER20080001
Permit Number LA0 000 365 688-OP-RN-1

For

CONTAINER STORAGE AREA

I. PERMIT PREAMBLE

This permit is issued to Lamp Recyclers of Louisiana, Inc. dba Lamp Environmental Industries, Hammond facility, Hammond, Tangipahoa Parish, Louisiana (hereinafter referred to as the "Permittee"), by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted thereunder, and by the United States Environmental Protection Agency (EPA) under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA).

For the purposes of this permit, "Administrative Authority" shall mean the Secretary of the LDEQ or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the Permittee's certification that such information is accurate and that all facilities will be constructed, operated and maintained as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted thereunder.

All definitions contained in this permit shall have the meaning as defined in the Louisiana Administrative Code (LAC), Title 33, Part V, Subpart 1 unless otherwise stated herein.

All regulating citations are defined as being the regulation in effect on the date of issuance of this permit. New and/or amended regulations are not included as permit requirements until permit modification procedures, as specified in Condition II.C of this permit, are completed, except as provided by LAC 33:V.307.A.

GLOSSARY OF TERMS

For the purpose of this permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the contexts of use in this permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Administrative Authority" means the secretary of the Louisiana Department of Environmental Quality (LDEQ) or his/her designee or the appropriate assistant secretary or his/her designee.

"Application" refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

"Area of Concern" (AOC) means any discernable unit or area, which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

"Area of Investigation" (AOI) is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

"CFR" means the Code of Federal Regulations.

"CWA" means Clean Water Act, 33 U.S.C. § 1251 et seq.

"Corrective Action" is an activity conducted to protect human health and the environment.

"Department" means the Louisiana Department of Environmental Quality (LDEQ).

"Destination Facility" is a facility that treats, disposes of, or recycles a particular category of universal waste. A facility that shreds, crushes, heats or otherwise treats electronic devices or any component thereof, shall be considered a destination facility.

"EPA" means the United States Environmental Protection Agency.

"HSWA" means the 1984 Hazardous and Solid Waste Amendments to RCRA.

"Hazardous constituent" means any constituent identified in LAC 33:V.Chapter 31. Table 1, or any constituent identified in LAC 33:V.3325. Table 4.

"Lamp (Universal Waste Lamp)" is the bulb or tube portion of an electric lighting device. A lamp is specifically designed to produce radiant energy, most often in the ultraviolet, visible, and infra-red regions of the electromagnetic spectrum. The most common universal waste electric lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.

"LDEQ" means the Louisiana Department of Environmental Quality.

"LELAP" means the Louisiana Environmental Laboratory Accreditation Program.

"Operating record" means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing or other data as may be required--to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.b.

"Permittee" means Lamp Recyclers of Louisiana, Incorporated dba Lamp Environmental Industries (LEI) located at 46257 Morris Road, Hammond, Louisiana 70401.

"RCRA Permit" means the full permit, with the Resource Conservation and Recovery Act (RCRA) and 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA portions.

"RFA" means RCRA Facility Assessment.

"RFI" means RCRA Facility Investigation.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"SARA" means Superfund Amendments and Reauthorization Action of 1985.

"Solid Waste Management Unit" (SWMU) mean any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

“Stabilization” is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

“TCLP” means Toxicity Characteristic Leaching Procedure.

“Universal Waste” is any of the following hazardous wastes: batteries, pesticides, mercury-containing equipment, lamps, electronics, and antifreeze which are subject to the universal waste requirements of LAC 33:V.Chapter 38.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the Permittee to store hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit during its term constitutes compliance for purposes of enforcement, with LAC 33:V.Subpart 1, except for those requirements not included in the permit under LAC 33:V.307.A.1-4, and with Subtitle C of RCRA, HSWA, and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, the Act (La. R.S.30:2001 et seq.) or under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes in, or inaccuracies in the information in the permit application.

The Administrative Authority may suspend, modify, revoke and reissue, or terminate the permit for cause or when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or the LAC 33:V.309.F, 311.A, or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Act is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of a permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in the LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the conditions of this permit as required by the LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment and/or appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit and in accordance with LAC 33:V.309.E.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required to be kept by this permit and in accordance with LAC 33:V.309.H.

II.E.8. Inspection and Entry

In accordance with LAC 33:V.309.I, the Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity, in accordance with LAC 33:V.309.J.1. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest version; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method; or an equivalent method as specified in the attached Waste Analysis Plan as referenced in Attachment I.

II.E.9.b. Records of monitoring information, in accordance with LAC 33:V.309.J.3, shall include, but are not limited to:

II.E.9.b.i. the date, exact place, and time of sampling or measurements;

II.E.9.b.ii. the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;

II.E.9.b.iii. the date(s) analyses were performed;

II.E.9.b.iv. the name(s) and signature(s) of the individual(s) who performed the analysis;

II.E.9.b.v. the analytical techniques or methods used; and

II.E.9.b.vi. the results of such analyses; and

II.E.9.b.vii. associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c.i. Any commercial laboratory providing analytical results and test data to the LDEQ required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance

with LAC 33:I.Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the LDEQ.

LAC 33:I.Subpart 3 (Chapters 45-49) provides requirements for accreditation program. Regulation and a list of labs that have applied for accreditation are available on the LDEQ website located at: <http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx>.

In accordance with LAC 33:I.4501, the requirements for LELAP accreditation apply whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the LDEQ;
- required to be included in a monitoring report submitted to the LDEQ;
- required to be submitted by contract; or
- otherwise required by the LDEQ regulations.

II.E.9.c.ii. If the Permittee decides to use its own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document quality assurance/quality control procedures that are commensurate with requirements in LAC 33:I.Subpart 3, Laboratory Accreditation.

II.E.9.c.iii. For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C. File copies shall be kept for LDEQ Inspection for a period of not less than three (3) years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the facility, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (La. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

II.E.12. Physical Facility after Modification

For any new or existing unit being modified, the Permittee may not treat, store, or dispose of hazardous waste in modified portion of the unit until the unit is complete and:

II.E.12.a. The Permittee has submitted to the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

II.E.12.b. The Administrative Authority has inspected the new or modified unit following a request to make a final inspection by the Permittee as required by LAC 33:V.303.I, and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator with written approval by the Administrative Authority and if it is modified or revoked and reissued pursuant to the LAC 33:V.309.L.4, 321.B, 1531.D and LAC 33:I.Chapter 19.

The Permittee's failure to notify the new owner or operator of the requirements of LAC 33:V.Subpart 1 and LAC 33:I.Chapter 19 in no way relieves the new owner or operator of his obligation to comply with all applicable requirements.

Changes in the ownership or operational control of a facility shall be made with written notification to the Office of Environmental Services. The new owner or operator shall submit a Name/Ownership/Operator Change Form (NOC-1 Form) prior to or no later than forty-five (45) days after the change. The Administrative Authority may initiate action to terminate or revoke an existing media permit for a failure to disclose a change of ownership or operational control within forty-five (45) days after the change, in accordance with LAC 33:I.1909.B. The previous Permittee and the new Permittee must comply with all applicable requirements of LAC 33:I.1909.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the ground waters of the state but does not result in an emergency condition, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge resulting in contamination of ground waters of the state by moving in, into, within or on any saturated subsurface strata, the Permittee shall notify the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC within seven (7) days after learning of the discharge.

II.E.19. Written Notification Reports for Unauthorized Discharges

The Permittee shall submit written reports for any unauthorized discharge that requires notification, under Conditions, II.E.16, II.E.17, and II.E.18 of this permit, to the SPOC within seven (7) calendar days after notification required by Conditions II.16 through II.18, in accordance with LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Conditions II.E.16, II.E.17, and II.E.18 for confirmed releases to the groundwater that may endanger human health or the environment, in accordance with LAC 33:V.309.L.7. This report shall include the following:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b.i. the name, address, and telephone number of the owner or operator;

II.E.20.b.ii. the name, address, and telephone number of the facility;

II.E.20.b.iii. the date, time, and type of incident;

II.E.20.b.iv. the name and quantity of materials involved;

II.E.20.b.v. the extent of injuries, if any;

II.E.20.b.vi. an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and

II.E.20.b.vii. the estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The Permittee shall also provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment not reported under Condition II.E.20. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance including exact dates and times; whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee shall submit a written report within fifteen (15) calendar days after the time Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.d.

II.E.22. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.20.

II.E.23. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information, in accordance with LAC 33:V.309.L.12.

II.E.24. Signatory Requirement

All application, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Schedule of Compliance

II.E.25.a. Within thirty (30) days of the effective date of this permit, the Permittee must submit updated maps to the required scale. The current maps provided at the alternate map scale (1"=1000') are not legible. The facility layout, units, surrounding areas and actual location could not be identified on the maps at the scale provided. A request for an alternate map scale should have been submitted prior to the submission of the application. The regulations state that all maps must be clear, legible and identifiable. A map or aerial photograph can be on two sheets with an identifiable section line.

II.E.26. Updated Documents to be Submitted Prior to Operation

(RESERVED)

II.E.27. Documents to be Maintained at Facility Site

II.E.27.a. The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report and in compliance with LAC 33:V.321, 322 and 323.

II.E.27.a.i. Waste Analysis Plan submitted in accordance with LAC 33:V.1519 (see Attachment 1);

II.E.27.a.ii. Contingency Plan submitted in accordance with LAC 33:V.1513 (see Attachment 1);

II.E.27.a.iii. Closure Plan submitted in accordance with LAC 33:V.3511 (see Attachment 1);

II.E.27.a.iv. Security Plan submitted in accordance with LAC 33:V.1507 and 1513 (see Attachment 1);

II.E.27.a.v. Closure Plan cost estimate for facility closure submitted in accordance with LAC 33:V.3705 (see Attachment 1);

II.E.27.a.vi. Arrangements with the local authorities in accordance with LAC 33:V.1511.G;

II.E.27.a.vii. Personnel Training Plan and the training records required by LAC 33:V.1515 (see Attachment 1);

II.E.27.a.viii. Operating records required by LAC 33:V.1529, and

II.E.27.a.ix. Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

II.E.27.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.28. Annual Report

An annual report must be submitted by March 1 of each year covering all unit(s) listed in this permit and their activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.29. Manifest

The Permittee shall report manifest discrepancies and unmanifested waste as per LAC 33:V.309.L.8 and 9.

II.E.30. Emissions

Air emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.31. Water Discharges

Water discharges, if any, must be in conformity with effluent limitations established by the Clean Water Act operating under a National Pollutant Discharge Elimination Systems (NPDES) permit and reported as required by that permit in accordance with LAC 33:V.1505.A.1.

II.E.32. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the Permittee determines that an unpermitted hazardous waste unit(s) exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.23 of this permit.

II.E.33. Compliance with Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in La. R.S. 30:2193, and all regulations promulgated thereunder.

II.E.34. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.35. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements of this permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

II.E.36. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the Permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

III. GENERAL FACILITY CONDITIONS

III.A. DESIGN AND OPERATION OF ALL FACILITIES

III.A.1. The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

III.A.2. The Permittee shall not receive for storage any hazardous waste generated outside the United States or its territories, in accordance with La. R.S. 30:2189 of the Louisiana Environmental Quality Act.

III. A.3. The Permittee may receive only those off-site hazardous wastes which are listed in the Part A of this permit.

III.B. REQUIRED NOTICE

When the Permittee anticipates receipt of hazardous waste from an off-site source (except where the Permittee is also the generator), it must inform the generator in writing that the Permittee has the appropriate permits for, and will accept, the waste to be shipped by the generator. The Permittee must keep a copy of this written notice as part of the operating record as required by LAC 33:V.1527.

III.C. GENERAL WASTE ANALYSIS

The Permittee shall only manage those wastes described in the Waste Analysis Plan, referenced in Attachment 1, and in accordance with LAC 33:V.1519.

III.C.1. The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or state regulatory provisions.

III.C.2. Annually, the Permittee shall submit a certified statement that indicates that any laboratory (i.e., on-site laboratory or contract laboratory) that provides chemical analyses, analytical results, or other test data to the LDEQ, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:I.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services.

III.C.3. If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all potentially impacted hazardous waste streams generated by the Permittee on-site and treated, stored, and/or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include

laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including, physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the Permittee's Annual Report.

III.C.4. In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all the sampling and Quality Assurance/Quality Control (QA/QC) procedures and protocols contained in Condition II.E.9. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the Administrative Authority upon request.

III.D. SECURITY

The Permittee shall comply with the security provisions of LAC 33:V.1507 and the Security Plan referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection schedule in the Inspection Plan referenced in Attachment 1 of this permit. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections shall be kept as required by LAC 33:V.1509.D. The inspection schedule shall address the regulatory requirements of LAC 33:V.517.G, 1509, and 2109.

III.F. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by LAC 33:V.1515.A, B and C. This training plan shall follow the outline in the Training Plan referenced in Attachment 1, and any future revised training plans. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action,

soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control and/or containment of run-on and run-off from the maximum rainfall occurring in twenty-four (24) hours from a 25-year storm as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.2111.B.

III.J. HURRICANE EVENTS

The Permittee shall initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee shall install and maintain the equipment set forth in the Contingency Plan referenced in Attachment 1, as required by and which is in conformance with LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee shall test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency.

III.K.3. Access to Communications or Alarm Systems

The Permittee shall maintain access to the communications or alarm system, as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Required Aisle Space

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F.

III.K.5. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those State and Local agencies involved and those facilities and operations covered. Documentation of annual written renewal of arrangements with State and Local agencies shall also be included in

this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee shall immediately carry out the provisions of the Contingency Plan referenced in Attachment 1 of this permit, which complies with the emergency procedures described by LAC 33:V.1513.F, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee shall comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee shall review and amend in a timely manner, if necessary, the Contingency Plan, as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee shall comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

III.M.1. Use of the Manifest System

The Permittee shall comply with the applicable manifest requirements of LAC 33:V. Chapter 11.

III.N. RECORD KEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C.

III.N.2. Annual Report

The Permittee shall comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's storage facilities.

III.O. CLOSURE

The Closure/Post-closure Plan shall include the following responses by the Permittee to LAC 33:V.2117, 3503, 3505, 3507, 3509, 3511, 3513, and 3515.

III.O.1. Closure Performance Standard

The Permittee shall close the facility in accordance with the Closure Plan referenced in Attachment 1, and applicable sections of LAC 33:V.3505, 3507 and 3511.

III.O.2. Amendment to Closure Plan

The Permittee shall amend the Closure Plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322, and 323, where applicable.

III.O.3. Notification of Closure

The Permittee shall notify the Administrative Authority at least forty-five (45) days prior to the date he expects to begin closure, in accordance with LAC 33:V.3511.D.

III.O.4. Time Allowed for Closure

After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the Closure Plan referenced in Attachment 1 and LAC 33:V.3513. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the Closure Plan referenced in Attachment 1.

III.O.5. Disposal of Decontamination of Equipment

The Permittee shall decontaminate and/or dispose of all facility equipment in accordance with the Closure Plan referenced in Attachment 1, and LAC 33:V.3515.

III.O.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan referenced in Attachment 1 and as required by LAC 33:V.3517.

III.O.7. Inventory at Closure

The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed below in Table 1:

**TABLE 1
CONTAINER STORAGE**

Container Storage Area	Dimensions	Permitted Storage Capacity	Type of Service
FC-1	13' x 4'3"	2060 gallons	Liquid Non-Hazardous, Liquid Hazardous, and Liquid PCB Wastes
PC-1	19' x 4'4"	2050 gallons	
PC-2	19' x 4'4"	2050 gallons	
PC-3	50.5" x 50.5"	1710 gallons	
PC-4	50.5" x 50.5"	1710 gallons	
PC-6	106" x 30.25"	930 gallons	
PC-7	106" x 30.25"	930 gallons	Off-Specification and Unacceptable/Unknown Wastes
PC-5	51.5" x 51.5"	1140 gallons	
PC-8	51.5" x 51.5"	1140 gallons	Non-Liquid Non-Hazardous, Non-Liquid Hazardous, and Non-Liquid PCB Wastes
NC-1 ¹	68' x 25'	250,000 pounds	

¹Container Storage Area NC-1 also includes container storage areas PC-1, PC-2, PC-5, PC-6, PC-7, and PC-8

III.P. POST-CLOSURE

The Permittee will attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527; including maintenance and monitoring throughout the post-closure care period.

III.Q. COST ESTIMATES FOR CLOSURE/POST-CLOSURE

III.Q.1. The Permittee must maintain cost estimates for closure of all facilities in accordance with LAC 33:V.3705.B and 3707.

III.Q.2. The Permittee shall maintain and adjust the closure cost for inflation, as specified in LAC 33:V.3705.B, 3705.C, and for other circumstances that increase the cost of closure.

III.Q.3. The Permittee must adjust the closure cost estimate within thirty (30) days after

approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and or process changes on the closure cost estimate.

III.Q.4. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive in accordance with LAC 33:V.3705.A.1-4. The closure cost estimate shall be based on the maximum permitted inventory of each facility, as specified in Table 1 of this permit, and waste generated on-site as a result of operations at the permitted units and stored in the less than ninety (90) day storage area.

III.Q.5. In the event of a release of hazardous constituents to environmental media from the permitted units listed in Table 1 of this permit, the Permittee must maintain cost estimates accounting for the costs associated with corrective action remedy implementation of said releases as required by LAC 33:V.3301.B.

III.Q.6. Any closure/post-closure modifications are subject to LAC 33:V.321.

III.R. FINANCIAL ASSURANCE FOR FACILITY CLOSURE

The Permittee shall have, maintain and update financial assurance for closure, as necessary to comply with LAC 33:V.3707 for all units listed in Table 1.

III.S. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences for treatment and storage facilities or a group of such facilities in accordance with LAC 33:V.3715.A.

III.T. INCAPACITY OF THE PERMITTEE

Pursuant to LAC 33:V.3171.A, the Permittee, and any guarantor of a corporate guarantee specified in LAC 33:V.3707.F and 3711.F, must notify the Office of Environmental Services by certified mail of the commencement of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming the Permittee or guarantor as debtor, within ten (10) days after commencement of the proceeding.

Any Permittee who fulfills the requirements of LAC 33:V.3707, 3711 or 3715 by obtaining a trust fund, surety bond, letter of credit, or insurance policy will be deemed to be without the required financial assurance or liability coverage in the event of bankruptcy of the trustee or issuing institution, or a suspension or revocation of the authority of the trustee institution to act as trustee or of the institution issuing the surety bond, letter credit, or insurance policy to issue such instruments. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

IV. PERMITTED FACILITIES

IV.A. CONTAINER STORAGE

Details of the existing container storage areas in Table 2, including design and operational specifications, are contained in Permit Condition V.A of this Permit.

TABLE 2
(10) Existing Container Storage Areas

The LEI Storage Facility is permitted to store a maximum of 250,000 pounds of total waste, with liquid waste limited to 13,720 gallons, as detailed below:			
Container Storage Area	Dimensions	Permitted Storage Capacity	Type of Service
FC-1	13' x 4'3"	2060 gallons	<u>Liquid or Solid Storage</u> of Universal Waste, Polychlorinated Biphenyls Waste, and/or Hazardous Waste consisting of the following hazardous waste codes: D001 - Ignitable D002 - Corrosive D003 - Reactive D004 - Arsenic D005 - Barium D006 - Cadmium D007 - Chromium D008 - Lead D009 - Mercury D010 - Selenium D011 - Silver U151 - Mercury
PC-1	19' x 4'4"	2050 gallons	
PC-2	19' x 4'4"	2050 gallons	
PC-3	50.5" x 50.5"	1710 gallons	
PC-4	50.5" x 50.5"	1710 gallons	
PC-5	51.5" x 51.5"	1140 gallons	
PC-6	106" x 30.25"	930 gallons	
PC-7	106" x 30.25"	930 gallons	
PC-8	51.5" x 51.5"	1140 gallons	
NC-1 ¹	68' x 25'	250,000 pounds	<u>Solid Storage Only</u> of Universal Waste, Polychlorinated Biphenyls Waste, and/or Hazardous Waste consisting of the following hazardous waste codes: D001 - Ignitable D002 - Corrosive D003 - Reactive D004 - Arsenic D005 - Barium D006 - Cadmium D007 - Chromium D008 - Lead D009 - Mercury D010 - Selenium D011 - Silver U151 - Mercury

¹ Container Storage Area NC-1 also includes container storage areas PC-1, PC-2, PC-5, PC-6, PC-7, and PC-8.

V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES

V.A. CONTAINER STORAGE AREA

V.A.1. Description of Container Storage Area

The permit conditions as set forth under this Condition shall apply to the permitted container storage facilities as designated in Table 2.

V.A.2. Permitted and Prohibited Wastes

V.A.2.a. Permitted Waste

Subject to the terms of this Permit, the Permittee is allowed to store hazardous waste identified in the most current Part A Permit Application in containers as described in Table 2.

V.A.2.b. Prohibited Waste

The Permittee is prohibited from storing hazardous waste that is not identified in Condition V.A.2.a of this Permit.

V.A.3. Secondary Containment

V.A.3.a. Duty to Comply with LAC 33:V.2111.B

The Permittee shall design, construct, operate, and maintain the permanent and portable secondary containment systems in accordance with LAC 33:V.2111.B and the Permit Application.

V.A.3.a.i. Container Storage Area FC-1 shall have a permanent secondary containment system.

V.A.3.a.ii. Container Storage Areas PC-1, PC-2, PC-3, PC-4, PC-5, PC-6, PC-7, and PC-8 shall have portable secondary containment systems.

V.A.3.a.ii.(1) The portable secondary containment systems must be in use when liquid waste is being stored; and

V.A.3.a.ii.(2) The portable secondary containment systems may be removed when solid waste is being stored.

V.A.3.a.iii. Container Storage Area NC-1 does not contain a secondary containment system and shall not be used for storing liquid waste.

V.A.3.b. Prevention of Migration

V.A.3.b.i. The Permittee shall always maintain enough permanent or portable secondary containment capacity to contain at least ten (10) percent of the total volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids do not need to be considered in this determination.

V.A.3.b.ii. A base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

V.A.3.b.iii. The base must be sloped or the permanent or portable containment systems must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.

V.A.3.b.iv. Run-on into the permanent or portable containment systems must be prevented unless the containment system has sufficient excess capacity in addition to that required in LAC 33:V.2111.B.3 to contain any run-on which might enter the system.

V.A.3.b.v. Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in as timely a manner as is necessary to prevent overflow of the collection system.

If any collected material is a hazardous waste, it must be managed in accordance with all applicable requirements.

V.A.4. Operating Requirements

V.A.4.a. All permitted container storage areas and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 21 and the specifications, design criteria, and design limits specified in the Permit Application.

V.A.4.b. Duty to Comply with LAC 33:V.2103

The Permittee shall comply with LAC 33:V.2103. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste to a container that is in good condition or manage the waste in some other way that complies with the requirements of LAC 33:V.Chapter 21.

V.A.4.c. Duty to Comply with LAC 33:V.2105

The Permittee shall comply with LAC 33:V.2105. Hazardous wastes or treatment reagents must not be placed in containers if they could impair the ability of the container to contain the wastes or treatment reagents.

V.A.4.d. Management of Containers

V.A.4.d.i. Containers holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

V.A.4.d.ii. Containers holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

V.A.4.d.iii. Pallets shall be placed in rows with a minimum of two (2) feet of access aisle space between the rows, or the width necessary to get emergency equipment to any area of the aisle, whichever is greater.

V.A.4.d.iv. All containers must be placed so that hazardous waste identification labels may be read from the access aisle.

V.A.4.d.v. No drums or pallets may be stored directly over any sump area.

V.A.4.d.vi. Containers shall be stored on pallets not more than two (2) tiers of fiber or cardboard drums or three (3) tiers of steel drums high with not more than the equivalent of four (4) fifty-five (55) gallon containers per tier. The pallets will be placed in rows with a minimum two (2) feet of aisle space between rows. The pallets of containers must be inspected for damage. Containers shall not be stored on broken or damaged pallets. If a pallet is broken or damaged, the Permittee must replace the pallet(s) in a timely manner.

V.A.4.d.vii. If any hazardous waste is emptied from a container, the residue remaining in the container is not considered a hazardous waste if the container is "empty" as defined in LAC 33:V.109. In this event, management of the container is exempt from the requirements of LAC 33:V.Chapter 21.

V.A.5. Ignitable, Reactive, and Incompatible Wastes

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517, 2113 and 2115.

V.A.6. Inspections**V.A.6.a. Inspection Schedule**

The Permittee shall comply with LAC 33:V.2109 by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

V.A.6.b. Weekly Inspection

V.A.6.b.i. At least weekly, the Permittee must inspect areas where containers are stored for leaking containers and for deterioration of containers and containment systems caused by corrosion or other factors.

V.A.6.b.ii. All deficiencies noted during weekly inspections must be recorded and remedied in a timely manner. Remedial action as described in LAC 33:V.1513 shall be taken.

V.A.7. Response to Leaks or Spills

The Permittee shall manage spilled or leaked waste in accordance with LAC 33:V.2111.B.5-6.

V.A.8. Air Emission Control Equipment Standards

The Permittee shall comply with Condition V.B. of this permit for air emission control equipment for the permitted container storage area.

V.A.9. Recordkeeping**V.A.9.a. Inspections**

V.A.9.a.i. The Permittee shall document in the operating record for the facility inspection of those items in Condition V.A.G. of this Permit.

V.A.9.a.i.(1) The weekly log sheets shall include all inspected areas.

V.A.9.a.i.(2) The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

V.A.9.a.i.(3) Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

V.A.10. Closure and Post-Closure Care

V.A.10.a. Duty to Comply with LAC 33:V.2117

The Permittee shall comply with LAC 33:V.2117 by following the procedures specified in the Closure Plan, Attachment 1.

V.A.10.b. Post-Closure

The Permittee shall attempt to clean close all container storage areas. If a container storage area cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

V.B. AIR EMISSION STANDARDS

V.B.1. Performance Standards for Equipment Leaks

V.B.1.a. The facility is exempt from LAC 33:V.Chapter 17 Subchapter B in accordance with LAC 33:V.1717.B. No equipment that contains or contacts hazardous waste with organic concentrations of at least ten (10) percent by weight shall be managed at the facility.

V.B.1.b. The facility must maintain an exemption log in the facility operating record in accordance with LAC 33:V.1743.K.

V.B.2. Standards For the Container Storage Area

V.B.2.a. The Permittee shall comply with the applicable requirements of LAC 33:V.1747 to 1799 for the permitted container storage area, as listed in Table 3.

TABLE 3
Air Emission Controls for Containers

CONTAINER STORAGE AREA	LAC REFERENCE(S)	AIR EMISSION CONTROLS
LEI Storage Facility	LAC 33:V.1759.A-C, and F; LAC 33:V.1763-1767	Level 1

VI. GROUNDWATER PROTECTION

VI.A. APPLICABILITY

The regulations of the Louisiana Administrative Code (LAC), Title 33, Part V, Chapters 3, 5, 15, 33, and 35, La. R.S. 30:2171 et seq., and La. R.S. 30:2001 et seq., of the Environmental Quality Act, and the provisions of this section shall apply to groundwater protection programs for facilities that are used to store hazardous waste at Lamp Recyclers of Louisiana, Inc. dba Lamp Environmental Industries, Hammond facility, Hammond, Louisiana.

The Permittee shall comply with the monitoring, response and corrective action program provisions for the existing and any new systems in accordance with LAC 33:V.Chapter 33.

If groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand or continue, assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

VI.B. REQUIRED PROGRAMS

The Permittee does not conduct hazardous waste activities under this permit which currently require groundwater monitoring.

VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS

VII.A. STANDARD CONDITIONS

VII.A.1. Waste Minimization

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and that the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

VII.A.1.a. Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

VII.A.1.b. Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

VII.A.1.c. An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

VII.A.1.d. Factors that have prevented implementation of source reduction and/or recycling;

VII.A.1.e. Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

VII.A.1.f. An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;

VII.A.1.h. A demonstration of the need to use those processes that produce a

particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm.

VII.A.2. Dust Suppression

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

VII.A.3. Failure to Disclose

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

VII.A.4.a. If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

VII.A.4.b. The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

VII.A.4.c. Modifications of this Permit do not constitute a reissuance of the Permit.

VII.A.5. Permit Review

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.321.C. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

VII.A.6. Compliance with Permit

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with subtitle C of RCRA except for those requirements not included in the permit which:

VII.A.6.a. Become effective by statute;

VII.A.6.b. Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

VII.A.6.c. Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

VII.A.7. Specific Waste Ban

VII.A.7.a. The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

VII.A.7.b. The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

VII.A.7.c. The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

VII.A.7.d. The Permittee shall review the waste analysis plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

VII.A.8. Information Submittal for the Corrective Action Strategy

Failure to comply with any condition of the Permit, including information submittals, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the corrective action strategy must conform to those requirements outlined in the RECAP (see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under the RECAP shall be requested by the Permittee prior to submittal to the Administrative Authority, as deemed necessary. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

Louisiana Department of Environmental Quality
Office of Environmental Services
Remediation Services Division
P.O. Box 4314
Baton Rouge, LA 70821-4314

A summary of the planned reporting milestones pursuant to the corrective action requirements of this Permit is found in Table 4.

VII.A.9. Data Retention

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

VII.A.10. Management of Wastes

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process.

VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB AIR REGULATIONS) -

(RESERVED)

VII.C. SPECIFIC CONDITION - CLOSURE

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

VII.C.1. Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

VII.C.2. The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

VII.C.3. The Permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action for a release area. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP)** for screening and media-specific cleanup standards. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP.

VIII.A. ALTERNATE CORRECTIVE ACTION

VIII.A.1. This Permit will utilize the CAS Guidance Document (www.epa.gov/Arkansas/6pd/rcra_c/pd-o/riskman.htm) developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Appendix 1 of this permit contains a summary of corrective action activities completed to date and also describes where the Permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the Permittee is in the CAS process as detailed in Appendix 1.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMIs, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

VIII.A.2. Performance Standards

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c. The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.

The Permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

VIII.A.2.a. Source Control Performance Standard

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

VIII.A.2.b. Statutory and Regulatory Performance Standard

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

VIII.A.2.c. Final Risk Goal Performance Standard

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).

VIII.A.3. Use of RECAP

The latest edition of the RECAP document shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

The RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

The RECAP shall be used by the Permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

The RECAP shall be used by the Permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

VIII.A.3.a. Use of the Screening Option - The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

VIII.A.3.b. Use of Management Option 1 – The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

VIII.A.3.c. Use of Management Option 2 – The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

VIII.A.3.d. Use of Management Option 3 – The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

VIII.A.4. Corrective Action for Releases Beyond Facility Boundary: Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

VIII.A.5. Financial Responsibility: Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection. The Administrative Authority reserves the right to require financial assurance prior to remedy selection based upon facility compliance history, the extent and degree of contamination, financial health of the Permittee, and input from the public.

VIII.A.6. Summary of Corrective Action Activities: A summary of the corrective action activities associated with the facility is provided in Condition VIII, Appendix 1 of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Table 4 of this permit.

VIII.A.7. Approval of Alternate Schedule: The Permittee may submit a written request for an alternate schedule for a submittal deadline as presented in Table 4. The request should propose a specific alternate schedule and include an explanation as to why the alternate schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternate schedule.

VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING

VIII.B.1. Notice of Intent

The Permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS upon identification of a newly identified SWMU or AOC per Condition VIII.L or notification of newly identified releases at a SWMU or AOC per Condition VIII.M. The notice of intent should state the following in a concise manner:

VIII.B.1.a. General information regarding facility location;

VIII.B.1.b. General information regarding the facility's operational history;

VIII.B.1.c. General discussion on how the Permittee will proceed through the CAS;

VIII.B.1.d. Brief description of proposed performance standards for corrective action; and

VIII.B.1.e. Propose a date for a scoping meeting between the Permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

VIII.B.2. Scoping Meeting

The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the Permittee will present the following information to the Administrative Authority:

VIII.B.2.a. A conceptual site model (if one already has been developed);

VIII.B.2.b. Discussions on history of corrective action at the facility, including facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

VIII.B.2.c. Proposed performance standards for the facility with justification, and potential risk management approaches;

VIII.B.2.d. Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

VIII.B.2.e. A Communication Strategy Plan that specifies where in the CAS process the Permittee is currently and how the Permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

VIII.B.2.f. Site-specific concerns (i.e., sensitive environments or special subpopulations);

VIII.B.2.g. Need for interim measures or stabilization activities, if necessary; and

VIII.B.2.h. Schedule for submittal of the CAS Investigation Workplan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. The Permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

VIII.C. REPORTING REQUIREMENTS

VIII.C.1. The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by the Administrative Authority. The reporting schedule shall be determined on a case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

VIII.C.1.a. A description of the work completed and an estimate of the percentage of work completed;

VIII.C.1.b. Summaries of all findings, including summaries of laboratory data;

VIII.C.1.c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

VIII.C.1.d. Projected work for the next reporting period;

VIII.C.1.e. Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;

VIII.C.1.f. Changes in key project personnel during the reporting period; and

VIII.C.1.g. Summaries of all changes made in implementation during the reporting period.

VIII.C.2. Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

VIII.C.3. In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)

No later than 120 days after the scoping meeting, the Permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:1.Chapter 13). The Permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the Permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the “base document” to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority.

The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the Permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

VIII.D.1. Facility Profile

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.1.a.i. General geographic location;

VIII.D.1.a.ii. Property lines with the owners of all adjacent property clearly indicated;

VIII.D.1.a.iii. Facility structures, process areas and maintenance areas;

VIII.D.1.a.iv. Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

VIII.D.1.a.v. Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

VIII.D.1.b. The Facility Profile shall also include a description of ownership and operation of the facility.

VIII.D.1.c. The Permittee shall provide pertinent information for those spills that have not been assessed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the

materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

VIII.D.2. Land Use and Exposure Profile

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

VIII.D.2.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.2.a.i. Surrounding land uses, resource use locations, and natural resources/wetlands;

VIII.D.2.a.ii. Locations of sensitive subpopulations; and

VIII.D.2.a.iii. An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS example) of the RECAP.

VIII.D.3. Physical Profile

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

VIII.D.3.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.3.a.i. Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

VIII.D.3.a.ii. Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

VIII.D.3.a.iii. Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

VIII.D.3.a.iv. Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

VIII.D.3.a.v. Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

VIII.D.3.a.vi. Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

VIII.D.4. Release Profile

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

VIII.D.4.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

VIII.D.4.a.i. Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

VIII.D.4.a.ii. Isopleth maps depicting lateral extent and concentrations of COCs;

VIII.D.4.a.iii. Results of fate and transport modeling showing potential exposure concentrations and locations; and

VIII.D.4.a.iv. Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

VIII.D.4.b. Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

VIII.D.4.c. Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

VIII.D.5. Ecological Profile

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current, as well as, future impacts to receptors and/or their habitats shall be considered. The Ecological Profile shall include:

VIII.D.5.a. A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

VIII.D.5.b. A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

VIII.D.5.c. A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

VIII.D.5.d. A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

VIII.D.5.e. An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of the RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

VIII.D.6. Risk Management Profile

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

VIII.D.6.a. A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

VIII.D.6.b. A list of identified site-wide data gaps for further investigation.

VIII.D.6.c. Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

VIII.E. INTERIM MEASURES

VIII.E.1. If at any time during the term of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Workplan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

VIII.E.2. The Permittee may propose interim measures at any time by submittal of an Interim Measures Workplan subject to the approval of the Administrative Authority.

VIII.E.3. The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures and may require the submittal of an Interim Measures Workplan. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

VIII.E.3.a. Time required to develop and implement a final remedy;

VIII.E.3.b. Actual and potential exposure to human and environmental receptors;

VIII.E.3.c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;

VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;

VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;

VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

VIII.E.3.g. Weather conditions that may affect the current levels of contamination;

VIII.E.3.h. Risks of fire, explosion, or accident; and

VIII.E.3.i. Other situations that may pose threats to human health and the environment.

VIII.E.4. Upon approval of the Interim Measures Workplan and completion of the interim measure(s) implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.

VIII.E.5. At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMUs/AOCs for further corrective action.

VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN

VIII.F.1. The CAS Investigation Workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the Permittee and the Administrative Authority. The CAS Investigation Workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.

VIII.F.1.a. The CAS Investigation Workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Investigation Workplan is required to have DQOs that are developed to support the performance standard for each release.) The CAS Investigation Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

VIII.F.1.b. The CAS Investigation Workplan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

VIII.F.1.c. Development of the CAS Investigation Workplan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

VIII.F.1.c.i. Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

VIII.F.1.c.ii. Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

VIII.F.1.c.iii. Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

VIII.F.1.c.iv. Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

VIII.F.1.c.v. Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

VIII.F.1.c.vi. 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

VIII.F.1.c.vii. RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

VIII.F.1.c.viii. Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3rd Edition. November 1992, with revisions;

VIII.F.1.c.ix. The LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems," prepared by the LDEQ and the Louisiana Department of Transportation and Development.** This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

VIII.F.1.c.x. The LAC 33:I.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

VIII.F.2. After the Permittee submits the CAS Investigation Workplan; the Administrative Authority will approve, disapprove, or otherwise modify the CAS Investigation Workplan in writing. All approved workplans become enforceable components of this Permit.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS Investigation Workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

VIII.F.3. The Administrative Authority shall review for approval, as part of the CAS Investigation Workplan or as a new workplan, any plans developed pursuant to Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS

No later than fourteen (14) days after the Permittee has received written approval from the Administrative Authority for the CAS Investigation Workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS Investigation Workplan and the following:

VIII.G.1. The Permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

VIII.G.2. Deviations from the approved CAS Investigation Workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

VIII.H. RECAP REPORT

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the Permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS Investigation Workplan (Permit Condition VIII.F), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

VIII.H.1. The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

VIII.H.2. The report shall include, but not be limited to, the following:

VIII.H.2.a. Documentation of site investigation activities and results;

VIII.H.2.b. Evaluation of exposure scenarios to document impacts from releases;

VIII.H.2.c. Deviations from the CAS Investigation Workplan;

VIII.H.2.d. Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

VIII.H.2.e. The revised CSM with updated profiles which incorporate investigation and screening results; and

VIII.H.2.f. Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

VIII.I. REMEDIAL ALTERNATIVES STUDY

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the Permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

VIII.I.1. The Permittee shall evaluate remedies for each AOI that shall:

VIII.I.1.a. attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

VIII.I.1.b. control sources of releases;

VIII.I.1.c. meet acceptable waste management requirements;

VIII.I.1.d. protect human health and the environment; and

VIII.I.1.e. meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

VIII.I.2. The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

VIII.I.3. The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

VIII.I.4. If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

VIII.I.5. The RAS shall at a minimum include:

VIII.I.5.a. An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

VIII.I.5.b. An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

VIII.I.5.d. An assessment of the costs of implementation for potential remedies;

VIII.I.5.e. An assessment of the time required to begin and complete the remedy;

VIII.I.5.f. An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

VIII.I.5.g. An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

VIII.I.6. The Administrative Authority will review and evaluate the RAS and provide the Permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the Permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J. RISK MANAGEMENT PLAN

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

VIII.J.1. The Risk Management Plan shall at a minimum include:

VIII.J.1.a. A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

VIII.J.1.b. The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

VIII.J.1.c. Cost estimates and implementation schedules for proposed final remedies;

VIII.J.1.d. Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;

VIII.J.1.e. Remedy performance criteria and monitoring:

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

VIII.J.1.f. Contingency plans; and

VIII.J.1.g. Description and schedules for performance reviews.

VIII.J.2. After the Permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the Permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

VIII.J.3. If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the Permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

VIII.J.4. After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.J.5. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.J.6. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.3 of this permit.

VIII.J.7. If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification. The resultant modified permit will include schedules for remedy implementation as well as financial assurance provisions as required by Condition VIII.A.5 of this permit.

VIII.K. DETERMINATION OF NO FURTHER ACTION

VIII.K.1. NFA-ATT Determinations for Specific SWMUs/AOCs

VIII.K.1.a. Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification (¹ requiring Administrative Authority approval) request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

VIII.K.1.b. If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

VIII.K.1.c. In accordance with LAC 33:V.321.C.1.a.ii, the Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1¹ permit modification (¹ requiring Administrative Authority approval) request.

VIII.K.2. Facility-Wide NFA-ATT Determination

VIII.K.2.a. Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the Permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

VIII.K.2.b. The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

VIII.K.2.c. The Administrative Authority will review and evaluate the summary report and subsequently either inform the Permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

VIII.K.2.d. If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the Permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

VIII.K.2.e. After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

VIII.K.2.f. After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

VIII.K.2.g. If, based upon review of the Permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs

and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

VIII.K.2.h. If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

VIII.K.2.i. If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

VIII.K.3. Continued Monitoring

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

VIII.K.4. Additional Investigations

A determination of NFA-ATT shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU/AOC at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs

VIII.L.1. The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and

newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

VIII.L.1.a. The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

VIII.L.1.b. The type and function of the unit;

VIII.L.1.c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);

VIII.L.1.d. The period during which the unit was operated;

VIII.L.1.e. The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

VIII.L.1.f. Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU/AOC.

VIII.L.2. Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the Permittee in writing and request that the Permittee submit a Class 1¹ permit modification (¹ requiring Administrative Authority approval) request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC to Appendix 1, Table 1 of this permit.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The plan for investigation of SWMU or AOC will be reviewed for approval as part of the current CAS Investigation Workplan or a new CAS Investigation Workplan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC

The Permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Workplan or a new CAS Investigation Workplan. The Permit will be modified to incorporate the investigation, according to the Class 1¹ permit modification (¹requiring Administrative Authority approval) procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

VIII.N. PUBLIC PARTICIPATION REQUIREMENTS

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained in any draft permitting decisions or draft permit modification documents and the associated plans and reports submitted by the Permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.). At a minimum, the public participation requirements shall include the following.

VIII.N.1. NFA-ATT Determinations for Specific SWMUs/AOCs

Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1¹ permit modification request (¹requiring Administrative Authority approval) under LAC 33:V.321.C.1. The Permittee must notify the facility mailing list within 90 days of the Administrative Authority's approval of the Class 1¹ permit modification request, in accordance with LAC 33:V.321.C.1.a.ii and Condition VIII.K.1.c of this permit.

VIII.N.2. Draft Permitting Decision

The public may review and comment on the terms and conditions of the CAS during the public notice and comment period of the draft permitting decision. The Administrative Authority shall issue public notice upon preparation of the draft permitting decision in accordance with LAC 33:V.715. During the forty-five (45) day public comment period, the Administrative Authority will accept public comments on the draft permitting decision. At the end of the public comment period, the Administrative Authority will consider and address all public comments and make any necessary revisions to the draft permitting decision. After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permitting decision. The final permitting decision will include a "Responsiveness Summary" detailing all comments received on the draft permitting decision and the actions taken (if necessary) to correct the draft before issuance of the final permitting decision.

VIII.N.3. Final Remedy Selection

The public may review and comment on the terms and conditions of the Risk Management Plan as described in Conditions VIII.J.4 through VIII.J.7 of this permit. If after addressing all public comments the Administrative Authority determines that the Risk Management Plan is satisfactory, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will identify the proposed remedy for corrective action at the site and the reasons for its selection, describe all other remedies that were considered, and solicit for public review and comments on the Risk Management Plan included in the draft permit modification document.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

VIII.N.4. Facility-Wide NFA-ATT

Upon the completion of all activities specified in the Risk Management Plan and after all facility remedial objectives have been met, the Permittee may submit a summary report for a determination of NFA-ATT on a facility-wide basis in accordance with Condition VIII.K.2 of this permit. The public may review and comment on the summary report as described in Condition VIII.K.2.b. If after addressing all public comments the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will provide a summary detailing contamination sources, site investigations, the MO selected for the facility, facility remedial standards, remedial actions, and sampling results demonstrating that the facility remedial standards have been achieved.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

TABLE 4
Corrective Action Strategy Notification and Reporting Requirements

Below is a summary of the major notifications and reports that may be required by the Administrative Authority under the Corrective Action Strategy of this Permit in the event of releases requiring RCRA corrective action. The Administrative Authority will notify the Permittee of the notification and reporting requirements during the scoping meeting or another applicable stage of the corrective action process.

<u>Actions</u>	<u>Due Date</u>
Submit Notice of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)	To be submitted upon identification of a newly identified SWMU or AOC per Condition VIII.L or notification of newly identified releases at a SWMU or AOC per Condition VIII.M.
CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)	Within sixty (60) days of submittal of the Notice of Intent
Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)	Schedule to be determined by the Administrative Authority on a case-by-case basis
Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)	Upon request of the Administrative Authority
Provide briefings to the Administrative Authority (Condition VIII.C.3)	As necessary and upon request by the Administrative Authority
Submit Conceptual Site Model (CSM) (Condition VIII.D) and facility Performance Standards (Condition VIII.A.2) to the Administrative Authority	Within one-hundred and twenty (120) days after the scoping meeting
Perform Interim Measures (Condition VIII.E)	As determined by the Administrative Authority on a case by case basis
Submit Corrective Action Strategy (CAS) Workplan for the facility investigation to the Administrative Authority (Condition VIII.F)	Within one-hundred and eighty (180) days after the CAS Scoping Meeting
Implement site investigation activities under CAS Investigation Workplan according to approved schedule (Condition VIII.G)	Within fourteen (14) days of receipt of approval by the Administrative Authority
Submit RECAP Report to the Administrative Authority (Condition VIII.H)	Within ninety (90) days of completion of the site investigation
Submittal of Remedial Alternatives Study	Within ninety (90) days of completion of

(RAS) to the Administrative Authority (Condition VIII.I)	approval of the RECAP Report by the Administrative Authority
Submit Risk Management Plan to the Administrative Authority (Condition VIII.J)	Within sixty (90) days of approval of the RAS by the Administrative Authority
Submit NFA (and Permit Modification) request to the Administrative Authority (Condition VIII.K)	As necessary
Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)	Thirty (30) days after discovery
Notification of newly-discovered releases (Condition VIII.M)	Fifteen (15) days after discovery

APPENDIX 1**SUMMARY OF CORRECTIVE ACTION ACTIVITIES**

Lamp Recyclers of Louisiana Inc. dba Lamp Environmental Industries (LEI) currently has no ongoing corrective action for any AOCs and/or SWMUs at its Hammond storage facility. In the event any new AOCs or SWMUs are discovered, Appendix 1 will be modified in accordance with Condition VIII.L or VIII.M.

TABLE 1. SUMMARY OF CORRECTIVE ACTION ACTIVITIES

AOC/SWMU Number/Name	AOC/SWMU Description	Status of Corrective Activity	Corrective Action	Corrective Action Document/Type of Corrective Action	EDMS Document ID# and Approval Date

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
EPA ID LA0 000 365 668
AI# 24512
PERMIT NO. LA0 000 365 668-OP-RN-1

DOCUMENT TYPE	APPLICATION/ DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID NO.	COMMENTS
Closure Plan (includes closure cost estimates)	3/12/2010	46364703	Responses to Notice of Deficiency (NOD) I; Addendum
Contingency Plan	2/22/2010	45901404	Responses to Notice of Deficiency (NOD) I; Exhibit 571-H
Inspection Plan	3/12/2010	46364703	Responses to Notice of Deficiency (NOD) I; Addendum
Personnel Training Plan	2/22/2010	45901404	Responses to Notice of Deficiency (NOD) I; Exhibit 517-L
Waste Analysis Plan	3/12/2010	46364703	Responses to Notice of Deficiency (NOD) I; Addendum
Security Plan	2/22/2010	45901404	Responses to Notice of Deficiency (NOD) I; Exhibit 517-B(7)

Database Management System (EDMS) location:
<http://edms.deq.louisiana.gov/app/doc/querydef.aspx>